

REMARKS

This is intended as a full and complete response to the Office Action dated October 5, 2007, having a shortened statutory period for response set to expire on January 5, 2008. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1, 3, 6, 8-10, 12, 13, 15, 17, 19-22, 25 and 28 are pending in the application. Claims 1, 3, 6, 8-10, 12, 13, 15, 17, 19-22, 25 and 28 remain pending following entry of this response.

Claim Rejections - 35 U.S.C. § 103

Claims 1, 3, 6, 10, 15, 17 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Chatterjee et al.* (U.S. Patent No. 7,162,691, hereinafter, "*Chatterjee*").

Claim 8 is rejected under 35 U.S.C. 103(a) as being unpatentable over *Chatterjee* in view of *Thompson* (U.S. Patent No. 5,761,429).

Claim 9 is rejected under 35 U.S.C. 103(a) as being unpatentable over *Chatterjee* in view of *Toyama* (U.S. Publication 2004/0192343).

Claim 14 is rejected under 35 U.S.C. 103(a) as being unpatentable over *Chatterjee* in view of *Nakamura et al.* (U.S. Publication 2003/0074375, hereinafter "*Nakamura*").

Claim 20 and 25 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Chatterjee* in view of *Nolan et al.* (U.S. Patent No. 5,253,362, hereinafter "*Nolan*").

Claims 21 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Chatterjee* in view of *Nolan* and further in view of *Nakamura*.

Applicants respectfully traverse these rejections.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. See MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill

in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143. The present rejections fail to establish at least the third criteria.

With respect to claim 1, the Examiner takes the position that *Chatterjee* teaches creating an index for the first data object, the index comprising one or more index values, each generated based on one or more of the first plurality of identifying parameters that identify a location of the first data object (col. 1, lines 38-40; col. 6, lines 44-51); wherein creating the index for the first data object comprises classifying the first data object based on the first plurality of identifying parameters (col. 4, lines 52-53), selecting a first mapping, from a plurality of mappings, based on the classification of the first data object (col. 5, lines 30-35), and converting the first plurality of identifying parameters to one or more of the index values, as specified in the first mapping (col. 3, lines 48-50; col. 6, lines 30-34). However, the cited passages do not teach the claim element. The Examiner is incorrectly equating file extensions with identifying parameters. See col. 5 lines 30-38. File extension types are not identifying parameters in the sense that identifying parameters identify a location of a data object. For example, an identifying parameter could be a full file name including a full directory path or URL (See Application paragraph [0035]) or database, table, cell, column, or row (See Application Fig. 6B). File extensions do not identify a location of a data object. Specifically, *Chatterjee* is using file type to characterize a media file for a webpage. This is not the same as the claim element.

Similarly, the Examiner argues that *Chatterjee* teaches “creating an annotation corresponding to a second data object identified by a second plurality of identifying parameters, wherein the first and second sets of identifying parameters comprise different numbers of parameters” at col. 1, lines 33-36 and col. 5, lines 30-38. As discussed above, *Chatterjee* does not disclose identifying parameters. Therefore, a first and second set of identifying parameters comprising different numbers of parameters is not disclosed.

Additionally, the Examiner takes the position that *Chatterjee* teaches “creating an annotation corresponding to a first data object identified by a first plurality of identifying parameters that identify a location of the first data object” at col. 4, lines 6-18. However, *Chatterjee* does not disclose this claim element because it is not using identification parameters. Also, *Chatterjee* merely puts the annotations of the media files into a copy of the webpage.

Likewise, the Examiner argues that *Chatterjee* teaches “creating a first record containing the annotation corresponding to the first data object and the index for the first data object” at col. 4, lines 6-18. However, col. 4, lines 6-18 is directed to inserting annotations into a copy of a web page which can then be made available to indexing by existing search engines. Therefore, a web page with annotations is not a first record containing an index for a first data object.

Independent claims 10, 15 and 28 are rejected on similar grounds as claim 1. Therefore, claims 1, 10, 15, 28 and their dependents are believed to be allowable, and allowance of the claims is respectfully requested.

With respect to Claim 20, the Examiner argues that *Chatterjee* teaches “a plurality of mappings, each containing functions to map a set of identifying parameters for a different type of data object to one or more columns in the index table” at col. 5, lines 36-38. However, as discussed above, *Chatterjee* does not teach identifying parameters. The cited passage is directed to using media type to extract descriptive information which forms the content of the file, not mapping a set of identifying parameters for a different type of data object to one or more columns in an index table.

Therefore, claim 20 and its dependents are believed to be allowable, and allowance of the claims is respectfully requested.

Allowable Subject Matter

Claims 12-13 and 19 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

In view of the above arguments with respect to the independent claims from which these claims depend from, Applicants believe that these claims in condition for allowance.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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